

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

THE PORTLAND MINT,)	
)	
Plaintiff,)	
)	
v.)	
)	No. 20-518C
)	(Judge Horn)
THE UNITED STATES,)	
)	
Defendant.)	
)	

**DEFENDANT’S FIRST MOTION FOR AN
ENLARGEMENT OF TIME TO RESPOND TO PLAINTIFF’S AMENDED COMPLAINT**

Pursuant to Rule 6(b) of the Rules of the United States Court of Federal Claims, defendant, the United States, respectfully requests an enlargement of time of 14 days, to and including November 20, 2020, within which to file our response to the amended complaint filed by plaintiff, The Portland Mint. This is our first request for an enlargement of time for this purpose. Counsel for Portland Mint has indicated that plaintiff will consent to this motion.

Good cause exists for this motion. We are currently in the process of reviewing Plaintiff’s amended complaint, but we require additional time to coordinate with the agency and finalize our response.

The additional time requested is also necessary because of other work commitments that have required and continue to require undersigned counsel’s attention, including, in the Court of Federal Claims: (1) active discovery in *Entergy Nuclear Indian Point 2, LLC v. United States*, Fed. Cl. No. 19-949C; (2) active discovery in *Holtec Pilgrim, LLC v. United States*, Fed. Cl. 19-1159; (3) active discovery in *Advanced Powder Solutions, Inc. v. United States*, Fed. Cl. No. 20-137C, to include production of documents and depositions on November 5, 2020, and November 9, 2020; (4) reply brief in *Boston Edison Company, et al., v. United States*, Fed. Cl. No. 20-529C,

which is currently due on November 6, 2020; in the Court of Appeals for the Federal Circuit: (1) response to show cause order in *Jamie L. Quattro v. Office of Personnel Management*, Fed. Cir. No. 20-2255, which is currently due on November 5, 2020; (2) response brief in *Camille Mauro v. Social Security Administration*, Fed. Cir. No. 20-1252, which will be due within 21 days after petitioner's opening brief, which is currently overdue; (3) response brief in *Billie O. Stone v Secretary of Veterans Affairs*, Fed. Cir. No 20-1732, which is currently due on November 6, 2020; (4) response brief in *Gary R. Larson, Jr. v. Robert Wilkie*, Fed. Cir. No. 20-1647, which is currently due on November 27, 2020. In addition, undersigned counsel was recently ordered to perform two days of Grand Jury service on November 9-10, 2020, as a "special recall session" for Grand Jury service that he previously performed in February-March 2020.

Accordingly, we respectfully request that the Court grant our first request for an enlargement of time of 14 days, to and including November 20, 2020, within which to file our response to plaintiff's complaint.

Respectfully Submitted,

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November 3, 2020

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